

LISA A. FREY (NJ State Bar #: 033731983)

lisa@mertzel-law.com

MERTZEL LAW PLLC

1204 Broadway, 4th Floor

New York, NY 10001

Tel: 646-965-6900 x 5

Attorneys for Defendant,
DBEST PRODUCTS, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ECR4KIDS, L.P.,

Plaintiff,

v.

DBEST PRODUCTS, INC.

Defendant.

CIVIL ACTION NO. 23-2675-MCA-LDW

**[PROPOSED] ORDER GRANTING DBEST
PRODUCTS, INC.'S MOTION TO DISMISS**

Defendant dbest products, Inc. (“dbest”) having moved before this Court for an Order dismissing the First Amended Complaint of ECR4kids, L.P., pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6), on notice to all counsel, and the Court having considered the moving papers, any opposition thereto, and any reply papers, and for good cause being shown:

IT IS HEREBY ORDERED as follows:

1. Defendant’s motion to dismiss hereby granted; and
2. The First Amended Complaint is hereby dismissed with prejudice.

Dated: _____

Hon. Madeline Cox Arleo, U.S.D.J.